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May 30, 2024

The Honorable Cathy L. Waldor
United States District Court - Newark
M.L. King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Alvarado, Angel v. Township of Piscataway, and Piscataway Police Dept.
Docket No.: 2:24-cv-00520-EP-CLW

Dear Judge Waldor:

This office represents the defendants Township of Piscataway and the Township of Piscataway Police Department (collectively the "Township") in the above-referenced matter. Co-Defendant, Dominick Forlenza is represented by John F. Gillick, Esq. of Rainone Coughlin Minchello, LLC. On behalf of *all* Defendants, and with the consent of Plaintiff's counsel, we respectfully request an Order vacating the default entered against the Defendants and request an extension of time for them to file to Answer the Complaint. Please be advised that defense counsel will be filing a separate Motion in State Court seeking to vacate the expungement of records which are related to the subject matter of this litigation. In light of same, Defendants respectfully request thirty (30) days from the date of the Court's Order in order to file their respective Answers to the Complaint.

Thank you for your attention to this matter.

Respectfully submitted,

s/Marc D. Mory

MARC D. MORY

MAMO:pw

cc: Patrick P. Toscano, Jr., Esq. @ The Toscano Law Firm, LLC
John F. Gillick, Esq. @ Rainone Coughlin Minchello, LLC

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Attorneys for Defendants, Township of Piscataway and The Piscataway
Police Department

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK, NEW JERSEY

Plaintiff,

ANGEL ALVARADO

vs.

Defendants,

PISCATAWAY TOWNSHIP, THE
PISCATAWAY POLICE DEPARTMENT
and PISCATAWAY POLICE OFFICER
DOMINICK FORLENZA

Honorable Everlyn J. Padin

CIVIL ACTION NO. 2:24-cv-00520-
EP-CLW

NOTICE OF APPEARANCE

ELECTRONICALLY FILED

Please take Notice that Marc D. Mory, Esq. of Hoagland, Longo, Moran, Dunst & Doukas, LLP, 40 Paterson Street, P.O. Box 480, New Brunswick, New Jersey 08903, hereby enters an appearance on behalf of Defendants, Township of Piscataway and The Piscataway Police Department.

HOAGLAND, LONGO, MORAN,
DUNST & DOUKAS, LLP
Attorneys for Defendants,
Township of Piscataway and The
Piscataway Police Department

s/Marc D. Mory

By: _____

MARC D. MORY

Dated: May 30, 2024